

1 HANSON BRIDGETT LLP
2 KATHERINE A. BOWLES, SBN 287426
3 kbowles@hansonbridgett.com
4 STELLA PADILLA, SBN 301590
5 spadilla@hansonbridgett.com
6 ROBERT G. DAVIS, SBN 304758
7 rdavis@hansonbridgett.com
8 777 S. Figueroa Street, Suite 4200
9 Los Angeles, California 90017
Telephone: (213) 395-7620
Facsimile: (213) 395-7615

10 Attorneys for Leprino Foods Company,
Leprino Foods Health & Welfare Plan

11 **UNITED STATES DISTRICT COURT**

12 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

13 LEPRINO FOODS COMPANY;
LEPRINO FOODS HEALTH &
WELFARE PLAN,

14 Plaintiffs,

15 v.

16 AVANI OUTPATIENT SURGICAL
17 CENTER, INC., a California
Corporation; MOUNTAIN VIEW
SURGICAL CENTER, INC., a
California Corporation; THE
18 CENTER FOR SURGERY AT
BEDFORD, LLC, a California limited
liability company; AMY ZARAGOZA,
an individual; BABEK
MOEINOLMOLKI, an individual;
BENHAM KASHANCHI, an
individual; SAMUEL KASHANI, an
individual; SHERVIN AMINPOUR,
an individual; RALPH MAYER, an
individual; MICHAEL YADEGARI, an
individual; KARAPET
DERMENDJIAN, an individual;
SEPEHR LALEZARI, an individual;
MARIO ROSENBERG, an individual;
PEYMAN SOLIEMANZADEH, an
individual; and DOES 1-30,

19 Defendants.

20 Case No. 2:22-cv-07434 DSF (JC)
Assigned to Judge Dale S. Fischer.
Courtroom 7D

21 DECLARATION OF KATHERINE A.
BOWLES IN SUPPORT OF
REQUEST FOR ENTRY OF
DEFAULT

22 *Filed concurrently with Request for
Entry of default Against Defendant
Cristina Luz Perryman*

23 Action Filed: October 12, 2022
Trial Date: August 13, 2024

24 **AND RELATED COUNTERCLAIMS.**

1 I, Katherine A. Bowles, declare as follows:

2 1. I am an attorney duly admitted to practice before this Court. I am
3 a partner with Hanson Bridgett LLP, attorneys of record for Plaintiffs Leprino
4 Foods Company and Leprino Foods Health & Welfare Plan.

5 2. I have personal knowledge of the facts set forth in this
6 Declaration, and if called as a witness, I could and would competently testify
7 to the matters stated herein.

8 3. Plaintiffs Leprino Foods Company and Leprino Foods Health &
9 Welfare Plan (collectively, "Leprino") filed the Third Amended Complaint in
10 the above-titled action, *Leprino Foods Company, et al. v. Avani Outpatient*
11 *Surgical Center, Inc., et al.*, case number 2:22-cv-07434-DSF-JC, on
12 October 3, 2023 (Dkt. 251).

13 4. This Court issued a summons against Defendant Cristina Luz
14 Perryman ("Perryman") on October 3, 2023 (Dkt. 258).

15 5. On October 8, 2023, Perryman was personally served with both
16 the summons and the Third Amended Complaint.

17 6. On October 13, 2023, Plaintiffs filed with this Court a proof of
18 service of summons evidencing service of both the Third Amended
19 Complaint and summons on Perryman (Dkt. 271).

20 7. Perryman has failed to file a response to the Third Amended
21 Complaint and the time allowed for her to respond to the Third Amended
22 Complaint has expired.

23 8. Perryman is neither a minor or an incompetent person.

24 I declare under penalty of perjury under the laws of the United States
25 of America that the foregoing is true and correct.

26 ///

27 ///

28 ///

1 Executed on November 8, 2023, at Los Angeles, California.
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


Katherine A. Bowles

PROOF OF SERVICE

Leprino Foods Company, et al., v. Avani Outpatient Surgical Center, et al.

U.S.D.C. Central District of CA, Case No. 2:22-cv-07434 DSF (JC)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of . My business address is 777 S. Figueroa Street, Suite 4200, Los Angeles, CA 90017.

On November 9, 2023, I served true copies of the following document(s) described as **DECLARATION OF KATHERINE A. BOWLES IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

SEE ATTACHED SERVICE LIST.

BY HAND DELIVERY: I caused such envelope(s) to be delivered by hand to the office of the addressee(s).

**Cristina Luz Perryman
2256 Pleasant Court
Hanford, CA 93230**

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on November 9, 2023, at Los Angeles, California.

/S/ Silvia Abrignani

SERVICE LIST

Leprino Foods Company, et al., v. Avani Outpatient Surgical Center, et al.

U.S.D.C. Central District of CA, Case No. 2:22-cv-07434 DSF (JC)

Nicholas D. Jurkowitz
James A.F. Curcio
Fenton Law Group LLP
1990 S. Bundy Drive, Suite 777
Los Angeles, CA 90025
PH: 310-444-5244
FX: 310-444-5280
Emails:
njurkowitz@fentonlawgroup.com
jcurcio@fentonlawgroup.com
nnatelsky@fentonlawgroup.com
esun@fentonlawgroup.com

Attorneys for Defendants
Avani Outpatient Surgical Center,
Inc., and Mountain View Surgical
Center, Inc.

Jerry Sparks, Esq.
Sparks Law Form, APC
650 Town Center Drive, Suite 1200
Costa Mesa, CA 92626
PH: 714-546-4300
FX: 714-546-5430
irs@sparksfirm.com

Attorney for Defendant
Ralph Mayer

Nigel Burns, Esq.
Nick Stahl
The Law Offices of Nigel Burns
800 West 1st St., Suite 401-12
Los Angeles, CA 90012
PH: 213-687-8080
FX: 213-687-8383

Attorney for Defendant
Amy Zaragoza

nburns@burnsattorneys.com
nstahl@burnsattorneys.com
dturner@burnsattorneys.com

Bruce A. Berman
The Berman Law Firm, APC
1875 Century Park East, Ste. 2230
Los Angeles, CA 90067
PH: 213-683-1908
Email: Bruce@bermanlawapc.com

Attorney for Defendant
The Center for Surgery at Bedford,
LLC

[Note: Updated April 2023]

1 Michael M. Amir
2 Mary Tesh Glarum
3 Doll'Amir & Eley LLP
4 725 S. Figueroa Street, Suite 3275
5 Los Angeles, CA 90017
6 PH: 213.542.3380
7 FX: 213.542.3381
8 Emails:
9 mamir@dollamir.com
10 mglarum@dollamir.com
11 cramirez@dollamir.com

Attorneys for Defendant
Sepehr Lalezari

12 James J. Kjar
13 Kylie A. Schofield
14 Kjar, McKenna & Stockalper, LLP
15 840 Apollo Street, Suite 100
16 El Segundo, CA 90245
17 PH: 424-217-3026
18 FX: 424-367-0400
19 Emails:
20 kjar@kmslegal.com
21 kschofield@kmslegal.com
22 dharris@kmslegal.com
23 joneill@kmslegal.com

Attorneys for Defendant
Karapet Dermendjian

24 Steven M. Goldsobel
25 Vandad Khosravirad
26 Law Offices of Steven Goldsobel
27 1901 Avenue of the Stars, Suite 1750
28 Los Angeles, CA 90067
PH: 310-552-4848
E-mails:
steve@sgoldsobel.com
vandad@sgoldsobel.com
samantha@aoldsbol.com

Attorney for Defendant
Shervin Aminpour

29 Ryan G. Jacobson
30 Edward A. Stumpf
31 Helton Law Group APC
32 1590 Corporate Drive
33 Costa Mesa, CA 92626
T: 562-901-4499 /F: 562-901-4488
Emails:
estumpf@helton.law
riacobson@helton.law

Attorney for Defendant
Michael Yadegari

1 Benjamin N. Gluck
2 Elliot C. Harvey Schatmeier
3 Bird, Marella, Boxer, Wolpert,
Nessim, Drooks, Lincenberg & Rhow,
P.C.
4 1875 Century Park East, 23rd Floor
Los Angeles, California 90067
PH: (310) 201-2100
5 FX: (310) 201-2110
Emails:
6 bgluck@birdmarella.com
ehs@birdmarella.com
7 dthrockmorton@birdmarella.com
tdicks@birdmarella.com

Attorney for Defendant
Dr. Samuel Kashani; Daniel
Shouhed, M.D.

9 Gary L. Tysch
10 Law Offices of Gary L. Tysch
16133 Ventura Blvd., Ste. 580
Encino, CA 91436
11 PH: 818-995-9555
Fax: 818-995-9550
12 gltysch@pacbell.net

Attorney for Defendant
Babek Moeinolmolki

13 Scott J. Stitt
14 Anna-Sophie Tirre
Tucker Ellis LLP
15 515 South Flower Street Forty
Second Floor
16 Los Angeles, CA 90071-2223
Direct: 213-430-3304 (LA) | Cell: 614-
738-0865
17 scott.stitt@tuckerellis.com
anna-sophie.tirre@tuckerellis.com
sofia.escalante@tuckerellis.com

Attorneys for Mojgan Kashanchi as
Administrator of Behnam
Kashanchi's Estate, Trustee of The
Behnam Kashanchi & Mojgan
Kashanchi Revocable Living Trust,
and Trustee of the Kashanchi B & M
Living Trust

19 Cristina Luz Perryman
20 2256 Pleasant Court
21 Hanford. CA 93230

In Pro Per
PERSONAL SERVICE ONLY